

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy No. 16-21906-CMB
Fred A. Angel, Sr.,)
Debtor,) Chapter 13
PNC Bank, N.A.,)
Movant,) Related to Claim No. 8
vs.)
Fred A. Angel, Sr. and Ronda J. Winnecour,)
Respondents.) Document No.

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

AND NOW, comes the Debtor, Fred A. Angel, Sr., by and through his attorneys,
Donald R. Calaiaro and Calaiaro Valencik, and presents the following:

1. This case was originally filed on June 10, 2016.
2. On May 2, 2018, PNC Bank, N.A. filed a notice of payment change with the Court.
3. The Debtor has completed his Plan and there is no reason to amend the plan.
4. The Debtor will make any future payments directly to PNC Bank. N.A.

Respectfully submitted,

DATED: May 23, 2018

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